

Summary of Responses to EPA and CDH Comments  
on the draft IRAP dated June 12, 1990

The document has been significantly revised based on EPA and CDH comments as well as comments provided by DOE Headquarters. To facilitate your review of the draft final IRAP this letter highlights some of the more significant changes that have been made to the document.

The Executive Summary and Introduction have been almost entirely rewritten to reflect changes made to subsequent sections, and to more clearly identify the purpose for conducting the Interim Measures/Interim Remedial Action (IM/IRA). We have now documented the high priority EPA and CDH has assigned to this project and the agreement that was reached between DOE, EPA, and CDH in meetings held during February and March 1990 to conduct the project.

The hydrogeology and nature and extent of contamination in Section 2 have been completely revised to add detail yet achieve conciseness in presentation. The hydrogeology discussion is more specific to OU 2. The discussions of the nature and extent of contamination in the various media has been expanded to include a discussion of the preliminary background characterization, and is more comprehensive in terms of evaluating all the available data. To the extent practical with the existing chemical and hydrologic data, correlations are drawn between ground water and surface water contamination, and their hydraulic relationship. Maximum use of tables is now provided to summarize contamination within each medium and shorten the text.

Section 3 has been revised significantly to encompass the provisions of the March 1990 national Contingency Plan (NCP). Potential chemical-specific ARARs have been defined based on the most stringent of the applicable or relevant and appropriate standards. This represents a significant change relative to the ARARs discussion presented in the draft IRAP. We have also identified the carcinogenic and systemic toxicant risks associated with achieving the potential ARARs. Section 3 no longer presents arguments for specific ARAR waivers nor are outliers removed from the data base in evaluating expected influent quality to the treatment system. However, it is still stated that the NCP and the IAG allow for waivers of a chemical-specific waiver if the remedial action is an interim measure. We defer to the results of the treatability study in making a determination of this kind. Of course, regulatory approval will be necessary for any proposed ARAR waivers.

Section 4 has been modified to address concerns regarding the potential presence of methylene chloride, vinyl chloride, and acetone in the influent to the treatment plant. These compounds would not be effectively removed by the proposed activated carbon system. Because of the method of aggregating data from groups of surface water stations that are hydraulically connected in order to estimate the influent chemical composition to the treatment system, these compounds appear to be above ARAR in the influent. Although we have not altered our method of computation for the influent chemical composition, we have deleted these compounds from Table 4-1. These compounds are not likely to be present in the influent because they have only been detected in stations upstream of SW-61 (the point of contaminated surface water collection) on the South Walnut Creek. At SW-61, they have always been below detection limits and/or present in associated laboratory blanks suggesting these compounds are not present in the water at the point of collection. In effect, their predicted presence in the influent is an artifact of the conservative approach taken in estimating the chemical composition of the influent.

Section 4 has also been modified to show elimination of SW-103 from the list of sources/seeps to be collected. Due to the extensive area of steep saturated soils at this site and the need for about 3,000 linear feet of piping to bring this water back to the treatment facility, it was felt that the construction of this collection and transportation system was likely to release significant amount of contaminants to the surface water system and that these negative effects of construction outlined the relatively small benefits of treatment.

Some of the engineering details presented in Section 4, particularly for surface water collection, have been removed from the text in the draft final document. This has been done to allow maximum flexibility during detailed design to ensure that the most effective surface water diversion/collection system is designed and installed.

Section 6 has been modified to include a more thorough discussion of the upcoming treatability studies and their relationship to the implementation of the IM/IRA. This is provided in Section 6.4.

Only minor changes, in response to some specific comments received by all the reviewers, have been made to Sections 5, 7, and 8.

ADMIN RECORD